

### **REMARKS/ARGUMENTS**

Claims 1-6, 8-18 and 20-26 were previously presented, and are currently rejected under 35 U.S.C. § 103(a). Applicants respectfully traverse this rejection and submit that Claims 1-6, 8-18 and 20-26 as previously presented are patentable and in a condition for allowance. Accordingly, Applicants respectfully request withdrawal of all rejections and allowance of the pending claims.

### **REJECTIONS UNDER 35 U.S.C. § 103**

#### **Claims 1, 2, 13 and 14**

Claims 1, 2, 13 and 14 are rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent Publication Number 2002/0078208 to Crump et al. (“Crump”) in view of U.S. Patent Publication Number 2001/0050908 to Verkama (“Verkama.”) Applicants respectfully submit that Claims 1, 2, 13 and 14 as previously presented are patentable over any combination of Crump in view of Verkama.

A demonstration of *prima facie* obviousness requires a showing that the cited references, either together or alone, teach or suggest each and every element of the claimed invention. Applicants respectfully submit that Crump and Verkama fail to teach or suggest (1) re-establishing a first connection while maintaining the second connection between the first protocol service and the host service; and (2) linking after a ticket is validated, the re-established first connection to the maintained second connection. Both of these limitations are required by independent Claims 1 and 13.

#### **I. Crump and Verkama do not teach or suggest (1) re-establishing a first connection while maintaining the second connection between the first protocol service and the host service**

With regard to this limitation, Applicants respectfully point out that the Examiner previously stated in the Non-Final Office Action mailed on September 10, 2008, and the Final Office Action mailed on March 4, 2009, that U.S. Patent Number 6,484,206 to Crump et al. (“the ‘206 patent”) fails to disclose “while maintaining the second connection between the first protocol service and the host service.” *See* Office Action mailed on September 10, 2008, pages 3-4; Office Action mailed on March 4, 2009, page 3. The Crump reference cited in the present

office action, e.g. U.S. Patent Publication Number 2002/0078208 (“the ‘0078208 publication”), is merely the published version of the application that was allowed and issued as U.S. Patent Number 6,484,206. Thus, the Crump patent (i.e. the ‘206 patent) is substantially exactly the same as the Crump publication (i.e. the ‘0078208 publication.) What is more, the paragraphs cited by the Examiner, e.g. paragraphs 32, 36 and 39, are exactly the same as the disclosure in the ‘206 patent. Thus, paragraphs 32, 36 and 39 correspond exactly to column 4, lines 5-13 and 60-67, and column 5, lines 1-10 and 47-67.

Applicants respectfully submit that the above remarks demonstrate that the Examiner has twice stated that Crump does not disclose maintaining the second connection between the first protocol service and the host service. Therefore, the Examiner’s contention that Crump does teach or suggest “maintaining the second connection between the first protocol service and the host service,” contradicts the Examiner’s previous statements. In light of the Examiner’s prior statements and in the interest of compact prosecution, Applicants earnestly request that the Examiner withdraw the rejection with respect to this claim element.

Verkama, like Crump, also does not teach or suggest re-establishing a first connection while maintaining a second connection between a first protocol service and a host service. Rather, Verkama describes a system where information about a connection between an *Intelligent Network Service Control Point (INSCP)* and a *Mobile Switching Center (MSC1)* that acts like an *Intelligent Network Service Switching Point (INSSP)*, is transmitted to a new *Mobile Switching Center (MSC2)* when a user roams from an area of *MSC1* to *MSC2*. See Verkama paragraphs 12-13. Upon receiving the connection information, “a service connection is established from” *MSC2* to *INSCP*.

Verkama is entirely silent as to whether the connection between *MSC1* and *INSCP* remains intact and therefore fails to teach or suggest re-establishing a first connection because the first connection (i.e. the connection between *MSC1* and *INSCP*) is never disrupted.

Even if one were to characterize the connection between *MSC2* and *INSCP* as the first connection, Verkama does not describe *MSC2* and *INSCP* as having been first disconnected such that the connection needs to be reconnected. Furthermore, as stated previously, Verkama is entirely silent as to whether the connection between *MSC1* and *INSCP* is maintained or disrupted.

In light of the above remarks, Verkama and Crump fail to teach or suggest re-establishing a first connection while maintaining the second connection between the first protocol service and the host service.

II. Crump and Verkama do not teach or suggest (2) linking after a ticket is validated, the re-established first connection to the maintained second connection

The Examiner admits that Crump does not teach or suggest linking after a ticket is validated, the re-established first connection to the maintained second connection. The Examiner relies on Verkama to cure this deficiency in Verkama. Applicants respectfully submit that Verkama also does teach or suggest this element because, as stated above, Verkama does not teach or suggest a re-established first connection or a maintained second connection.

The service connection identifier described in Verkama, is connection information that is stored in *Service Logic Programs (SLP)* of the *Intelligent Network Service Control Point (INSCP)* so that the INSCP can transmit data packets to different *Mobile Switching Centers (MSCI)* that act like an *Intelligent Network Service Switching Point (INSSP)*. This is done so that the *SLP* can “control the packet data connection in a seamless manner, even though the subscriber is moving is areas of different support nodes.” See Verkama paragraph 12. The service connection identifier is not a connection nor is it a link between two different network connections. Instead the service connection identifier is a node identifier used to identify an endpoint so that packets can be routed to a user regardless of the user’s location. Thus, transmitting the service connection identifier from one endpoint, e.g. *MSCI*, to a second endpoint, e.g. *MSC2*, does not constitute linking network connections, instead it simply constitutes transmitting data from one node to another.

In addition to the above, at no point does Verkama describe a maintained second connection and a re-established first connection. As required by the claimed invention, a first connection is re-established after it has been disrupted first connection. Verkama is entirely silent as to whether the connection between *MSCI* and *INSCP* is maintained when the connection between *INSCP* and *MSC2* is established. Therefore Verkama cannot teach or suggest that the connection between *MSCI* and *INSCP* is re-established because Verkama never describes disrupting the connection between *MSCI* and *INSCP*. The Examiner states that the

“service connection” would have to be re-established, however as stated before, and re-stated with emphasis, Verkama does not describe a disrupted connection.

Even if one were to characterize the connection between *MSC2* and *INSCP* as the first connection, Verkama does not describe *MSC2* and *INSCP* as having been first disconnected. Therefore per the claimed invention, establishing the connection does not constitute re-establishing a connection because the connection was never disrupted.

In light of the above remarks, Verkama and Crump fail to teach or suggest linking after a ticket is validated, the re-established first connection to the maintained second connection. Therefore Claims 1 and 13 are patentable over Crump in view of Verkama. Claims 2 and 14 are also patentable over Crump in view of Verkama because Claims 2 and 14 depend on and incorporate the patentable subject matter of Claims 1 and 13. Accordingly, Applicants respectfully request that the Examiner withdraw the rejection with respect to these claims.

Claims 3-6, 8-11, 15-18 and 20-23

Claims 3-6, 8-11, 15-18 and 20-23 are rejected under 35 U.S.C. § 103(a) as unpatentable over Crump in view of Verkama and in further view of U.S. Patent No. 6,065,120 to Laursen et al. (“Laursen.”) Applicants respectfully submit that Claims 3-6, 8-11, 15-18 and 20-23 as previously presented are patentable over any combination of Crump in view of Verkama and in further view of Laursen.

Establishing *prima facie* obviousness of a claimed invention requires that the prior art teach or suggest each claim limitation. In view of the arguments stated above, Applicants respectfully submit that independent Claims 1 and 13 are patentable and in a condition for allowance. Therefore Claims 3-6, 8-11, 15-18 and 20-23 are also patentable and in a condition for allowance because Claims 3-6, 8-11, 15-18 and 20-23 depend on and incorporate all the patentable subject matter of Claims 1 and 13.

As argued in the Response submitted on June 4, 2009 and the Response submitted on October 6, 2009, and reiterated here with emphasis, Laursen describes a system for self-provisioning through a first device to ensure secure access to managed information and does not teach or even suggest re-establishing a first connection while maintaining a second connection. See Laursen, col. 1, lines 24-30. Thus, Laursen cannot teach or suggest linking after a ticket is

validated, the re-established first connection to the maintained second connection, because Laursen does not teach or suggest a re-established first connection and maintained second connection. Thus, Laursen fails to detract from the patentability of the claimed invention. Applicants therefore respectfully request that the Examiner withdraw the rejection with respect to these claims.

#### Claims 12 and 24

Claims 12 and 24 are rejected under 35 U.S.C. § 103(a) as unpatentable over Crump in view of Verkama and in further view of U.S. Patent No. 6,757,283 to Yamanaka et al. (“Yamanaka.”) Applicants respectfully submit that Claims 12 and 24 as previously presented are patentable over any combination of Crump in view of Verkama and in further view of Yamanaka.

Establishing *prima facie* obviousness of a claimed invention requires that the prior art teach or suggest each claim limitation. In view of the arguments stated above, Applicants respectfully submit that independent Claims 1 and 13 are patentable and in a condition for allowance. Therefore Claims 12 and 24 are also patentable and in a condition for allowance because Claims 12 and 24 depend on and incorporate all the patentable subject matter of Claims 1 and 13. Furthermore, the Examiner cites Yamanaka merely to address deleting a ticket after a predetermined period of time. Like Crump and Verkama, Yamanaka also fails to teach or suggest (1) re-establishing a first connection while maintaining the second connection between the first protocol service and the host service; and (2) linking after a ticket is validated, the re-established first connection to the maintained second connection. Thus, Yamanaka fails to detract from the patentability of the claimed invention. Applicants therefore respectfully request that the Examiner withdraw the rejection with respect to these claims.

#### CONCLUSION

Applicants contend that each of the Examiner’s rejections has been adequately addressed and that all of the pending claims are in a condition for allowance. Accordingly, Applicants respectfully request reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' agent would expedite prosecution of this application; the Examiner is urged to contact the Applicants' agent at the telephone number identified below.

Respectfully submitted,  
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Date: March 22, 2010

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